



7852 Walker Drive, Suite 200, Greenbelt, MD 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554

**EB Docket No. 06-36**

**Re: CERTIFICATION OF CPNI COMPLIANCE FILING – JANUARY 22, 2010**

Poka Lambro Telephone Cooperative, Inc.	499 Filer ID # 803514
Poka Lambro Telecommunications, Ltd.	499 Filer ID # 803513

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Kuykendall', is written over a light gray background.

John Kuykendall  
Vice President  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

Attachment

cc: Best Copy and Printing, Inc. *via email to [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)*

*Echelon Building II, Suite 200  
9430 Research Boulevard, Austin, Texas 78759  
Phone: 512-338-0473  
Fax: 512-346-0822*

*Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve  
Eagan, Minnesota 55121  
Phone: 651-452-2660  
Fax: 651-452-1909*

*547 South Oakview Lane  
Bountiful, UT 84010  
Phone: 801-294-4576  
Fax: 801-294-5124*

*6849 Peachtree Dunwoody Road  
Building B-3, Suite 300  
Atlanta, Georgia 30328  
Phone: 770-569-2105  
Fax: 770-410-1608*

STATEMENT OF FCC CPNI RULE COMPLIANCE

**Poka Lambro Telephone Cooperative, Inc.**

**P. O. Box 1340, Tahoka, TX 79373-1340 (806) 924-7234**

**Annual 47 C.F.R. §64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009

Date filed: January 22, 2010

Names of Companies Covered by this Certification: 499 Filer ID

Poka Lambro Telephone Cooperative, Inc. 803514

Poka Lambro Telecommunications, Ltd. 803513

Name of signatory: David McEndree

Title of signatory: General Manager and Chief Executive Officer

I, David McEndree, certify that I am an officer of the affiliated companies named above (collectively and individually "Company", and acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). See 47 C.F.R. §64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company as either state commissions, the court system, or at the Commission) against data brokers in 2009 or related to 2009. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

  
\_\_\_\_\_  
David McEndree

Attachment



**POKA LAMBRO TELEPHONE COOPERATIVE, INC.**

**Poka Lambro Telephone Cooperative, Inc. 499 Filer ID 803514  
Poka Lambro Telecommunications, Ltd. 499 Filer ID 803513**

**P. O. Box 1340, Tahoka TX 79373-1340 806/924-7234**

**2009 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE  
January 22, 2010**

This statement serves to explain how Poka Lambro Telephone Cooperative, Inc. and Poka Lambro Telecommunications, Ltd. (collectively and individually "Company"), are complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2011).

*All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.*

*As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.*

**1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

**2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

**3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2008.

## **5. Customer Notification and Authorization Process**

The Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out process. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process. The Company has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

## **6. Record of Customer CPNI Approval/Non-Approval**

At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

## **7. Procedures Protecting Against Disclosure of CPNI**

The Company implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:\*

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company does not provide customers with on-line access to customer account information.

The Company has implemented procedures to notify customers of account changes.

\*The Company does not provide customers with on-line access to customer account information.

## **8. Actions Taken Against Data Brokers and Responses to Customer Complaints**

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

<u>Not applicable.</u>	No actions taken against data-brokers.
	No customer complaints received.

## **9. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

## **10. Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

## **11. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.